

DESK MEMORANDUM

SUBJECT EAST COAST CHEMICAL (3 HW 33) JOINT NOTICE	
TO GIL HODOWITZ	FROM L LUNSK
DATE SENT (EPA)	DATE NEEDED

PLEASE CALL:
RETURNS
INFORMA
NECESSI
RECEIVED BY

where is draft concurrence sheet?

C-1

These were still attached!

Also, what does "fully permitted"  
land disposed for solids and dredges  
mean? BBA

MESSAGE:

THIS CAN BE DONE IN FINAL  
FORM. I WILL CALL YOU

BEFORE I GO ON VACATION  
TO MAKE SURE TNR

APPLICATION IS IN ORDER  
FOR JOINT NOTICE.

WE MUST GO TO JOINT NOTICE  
BY AUG 15 TO MEET OUR  
COMMITMENTS

A JOINT NOTICE OF PROPOSED ISSUANCE OF A PERMIT UNDER  
THE RESOURCE CONSERVATION AND RECOVERY ACT

United States Environmental Protection Agency, Region III,  
841 Chestnut Building, Philadelphia, Pennsylvania 19107

In conjunction with the

Pennsylvania Department of Environmental Resources, Bureau of Solid Waste  
Management, 1875 New Hope Street, Norristown, Pennsylvania 19401

Notice Date: August 1, 1985

The United States Environmental Protection Agency (EPA) and the Pennsylvania Department of Environmental Resources (PA-DER) propose to issue a permit for the storage and treatment of hazardous waste to East Coast Chemical Disposal, Inc., 201 E. Tenth Street, Marcus Hook, Pennsylvania 19061. The EPA permit is to be issued under the Authority of The Resource Conservation and Recovery Act (RCRA) while the State permit is to be issued under the authority of the Pennsylvania Solid Waste Management Act of 1980. The proposed facility has been assigned EPA Permit No. PAD980706162.

Facility Description: East Coast Chemical Disposal has applied to operate a facility for the storage and treatment of hazardous waste in drums only to service the needs of small and medium volume generators of hazardous waste. The customers of the facility will be those generators who do not have the facilities for adequate handling of the waste which they generate.

Containerized waste materials will be brought to the site in Marcus Hook, Delaware County, Pennsylvania in 55-gallon drums. The waste accepted will be segregated according to their chemical and physical characteristics as determined by both pre-acceptance chemical analysis and spot checks on received materials.

The treatment processes to be used will be specific to each class of waste treated. Typical processes to be employed include neutralization in drums only. In addition, recoverable solvents will be collected for off-site processing by a resource recovery facility. Solids and sludges generated will be disposed of at an approved and fully permitted land disposal facility. Specific treatment processes to be used for each class of waste materials will be a part of each waste analysis submitted for approval before the waste is accepted to the facility.

The treatment and storage areas will both have containment systems in the event of a spill or leak. The storage and treatment facility will have 15 storage cells to ensure compatibility of waste and a separate area for treatment in drums.

DER Tentative Decision: DER will issue a permit for hazardous waste treatment and storage. However, this facility will have to be properly bonded before this permit can be issued.

EPA Tentative Decision: This will read issue the permit with the following requirements:

The permit includes (boilerplate) requirements which must be in all EPA permits per regulation 40 CFR 270.30. A permit issued by the administrator or authorized representative after the date of enactment of the hazardous and solid waste amendments of 1984, shall require corrective action for all releases of hazardous waste or hazardous constituents from any solid waste management unit at a facility seeking a permit regardless of the time at which waste was placed in such units. The permittee has documented that there are no solid waste management units within the East Coast Chemical disposal facility boundaries at its Marcus Hook site.

#### Public Participation

Persons wishing to comment on the draft permit, permit application or object to permit issuance must submit their comments in writing. Duplicate copies of comments should be sent to the:

Environmental Protection Agency, Region III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

Attention: Gil Horowitz, Pennsylvania Section (3HW33)

and

Pennsylvania Department of Environmental Resources  
Bureau of Solid Waste Management  
1875 New Hope Street  
Norristown, Pennsylvania 19401

Attention: Lawrence H. Lunsik

• All comments received within 45 days of this public notice will be considered in the formulation of the final determinations regarding the permits.

In the event the Regional Administrator (EPA) or the Department of Environmental Resources Regional Solid Waste Manager, receive written notice of opposition to the draft permit and a request for a public hearing within the comment period referenced above, a joint EPA - Pennsylvania DER hearing shall be scheduled at a location convenient to the nearest population center to the proposed facility. Any person requesting a hearing must raise all reasonably ascertainable issues and must include all reasonable available arguments, factual grounds, and supporting material. If a public hearing is required, public notice will be given at least 30 days before the hearing. Any requests for a public hearing should be addressed to the Regional Administrator, Environmental Protection Agency, Region III, 841 Chestnut Building, Philadelphia, Pennsylvania 19107, and/or the Regional Solid Waste Manager, Pennsylvania Department of Environmental Resources, 1875 New Hope Street, Norristown, Pennsylvania 19401.

EPA's administrative record, including the application, all data submitted by the applicant, the fact sheet, the draft permit, maps showing the exact facility location, and comments received, and also a copy of the State draft permit may be reviewed and copied at EPA, Region III, 841 Chestnut Building, Sixth Floor, Philadelphia, Pennsylvania 19107, between the hours of 8:30 a.m. and 4:30 p.m., Monday through Friday. A copying machine will be provided for public use at a charge per page. Any persons desiring further information, copies of portions of the administrative record, or an appointment to review the record, should contact Joanne Cassidy, at the above address or call area code 215/597-1601.

A copy of the State administrative record, including the application, draft permit and fact sheet, will be available for review at the Department of Environmental Resources, Bureau of Solid Waste Management, 1875 New Hope Street, Norristown, Pennsylvania 19401. Any persons desiring further information should contact Mr. Larry Lusk, at the above address or call 270-1920.

Copies of the application are also available at the Marcus Hook Borough Municipal Building located at Tenth & Green Street, Marcus Hook, Pennsylvania, and the Delaware County Planning Department located at the Fronefield Building, Third & Orange Street, Media, Pennsylvania..

After consideration of all written comments and of the requirements and policies in RCRA, and appropriate regulations, the EPA Regional Administrator and the Pennsylvania DER Regional Solid Waste Manager will make their decisions regarding the permit issuance. If the determinations are substantially unchanged from those announced by this notice, the EPA Regional Administrator

sons submitting written comments. If the determinations are substantially changed, the EPA Regional Administrator and the Pennsylvania DER Regional Solid Waste Manager will issue a joint public notice indicating the revised determinations.

Joint Notice of Proposed Issuance of a Permit Under  
Resource Conservation and Recovery Act

United States Environmental Protection Agency, Region III  
841 Chestnut Building, Philadelphia, Pennsylvania 19107

in conjunction with the

Pennsylvania Department of Environmental Resources  
Bureau of Solid Waste Management  
1875 New Hope Street, Norristown, Pennsylvania 19401

Notice Date: August 2, 1985

The United States Environmental Protection Agency (EPA) and the Pennsylvania Department of Environmental Resources (PA-DER) propose to issue a permit for storage and treatment of hazardous waste to East Coast Chemical Disposal, Inc., 201 East Tenth Street, Marcus Hook, PA 19061. The EPA permit is to be issued under the authority of the Resource Conservation and Recovery Act (RCRA) while the State Permit is to be issued under authority of the Pennsylvania Solid Waste Management Act of 1980. The proposed facility has been assigned EPA permit number PAD 98 070 6162.

Facility Description

East Coast Chemical Disposal (ECCD) has applied to operate a facility for storage and treatment of hazardous waste in drums only to service the needs of small and medium volume generators of hazardous wastes. The customers of the facility will be those generators who do not have the facilities for adequate handling of the waste they generate.

Containerized waste materials will be brought to the site in Marcus Hook, Delaware County, Pennsylvania in 55 gallon drums. The waste accepted will be segregated according to their chemical and physical characteristics as determined by both pre-acceptance chemical analysis and spot checks on received materials.

The treatment processes to be used will be specific to each class of waste treated. Typical processes to be employed include neutralization in drums only. In addition, recoverable solvents will be collected for off-site processing by a resource recovery facility. Solids and sludges generated will be disposed of at an approved and fully permitted land disposal facility. Specific treatment processes to be used for each class of waste materials will be a part of each waste analysis submitted for approval before the waste is accepted by the facility.

The treatment and storage areas will both have containment systems in the event of a spill or leak. The storage and treatment facility will have 15 storage cells to ensure compatibility of waste and a separate area for treatment in drums.

DER Tentative Decision

Issue a permit for hazardous waste treatment and storage. However, this facility will have to be properly bonded before this permit can be issued.

EPA Tentative Decision

Issue the permit with the following requirements: The permit includes "boilerplate" requirements which must be in all EPA permits per regulation 40 C.F.R. §270.30. A permit issued by the Administrator or authorized representative after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 shall require corrective action for all releases of hazardous waste or hazardous constituents from any solid waste management unit at a facility seeking a permit regardless of the time at which waste was placed in such units. The Permittee has documented that there are no solid waste management units within the ECCD facility boundaries at its Marcus Hook site.

Public Participation

Persons wishing to comment on the draft permit, permit application or object to permit issuance must submit their comments in writing. Duplicate copies of comments should be sent to the:

Environmental Protection Agency, Region III  
841 Chestnut Building  
Philadelphia, PA 19107  
ATTN: Gil Horwitz  
Pennsylvania Section (3HW33)

and

Pennsylvania Department of Environmental Resources  
Bureau of Solid Waste Management  
1875 New Hope Street  
Norristown, PA 19401  
ATTN: Lawrence H. Lunsik

All comments received within 45 days of this public notice will be considered in the formulation of the final determinations regarding the permits.

In the event the Regional Administrator (EPA) or the Regional Solid Waste Manager (PA-DER) receives written notice of opposition to the draft permit and a request for a public hearing within the comment period referenced above, a joint EPA/Pennsylvania-DER hearing shall be scheduled at a location convenient to the nearest population center to the proposed facility. Any person requesting a hearing must raise all reasonably ascertainable issues and must include all reasonable available arguments, factual grounds and supporting material. If a public hearing is required, public notice will be given at least 30 days before the hearing. Any requests for a public hearing should be addressed to the Regional Administrator, Environmental Protection Agency

Region III, 841 Chestnut Building, Philadelphia, PA 19107 and/or the Regional Solid Waste Manager, Pennsylvania Department of Environmental Resources, 1875 New Hope Street, Norristown, PA 19401.

EPA's administrative record, including the application, all data submitted by the applicant, the fact sheet, the draft permit, maps showing the exact facility location, and comments received, and also a copy of the State draft permit, may be reviewed and copied at EPA, Region III, 841 Chestnut Building, 6th floor, Philadelphia, Pennsylvania 19107, between the hours of 8:30 a.m. and 4:30 p.m. Monday through Friday. A copying machine will be provided for public use at a charge per page. Any person desiring further information, copies of portions of the administrative record, or an appointment to review the record should contact Joanne Cassidy at the above address or call (215) 597-1601.

A copy of the State Administrative record, including the application, draft permit and fact sheet will be available for review at the Department of Environmental Resources, Bureau of Solid Waste Management, 1875 New Hope Street, Norristown, PA 19401. Any person desiring further information should contact Mr. Larry Lunsik at the above address or call (215) 270-1920.

Copies of the application, EPA/DER draft permits and EPA fact sheet are also available at the Marcus Hook Borough Municipal Building located at Tenth & Green Streets, Marcus Hook, PA, and the Delaware County Planning Department located at the Fronefield Building, Third & Orange Street, Media, PA.

After consideration of all written comments and of the requirements and policies in RCRA and appropriate regulations, the EPA Regional Administrator and the PA-DER Regional Solid Waste Manager will make their decisions regarding the permit issuance. If the determinations are substantially unchanged from those announced by this notice, the EPA Regional Administrator and the PA-DER Regional Solid Waste Manager will so notify all persons submitting written comments. If the determinations are substantially changed, the EPA Regional Administrator and the PA-DER Regional Solid Waste Manager will issue a joint public notice indicating the revised determinations.



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 23 1985

RCRA Draft Permit  
East Coast Chemical Disposal, Inc.  
Marcus Hook, PA - PAD 98 070 6162

Robert Allen, Chief  
Waste Management Branch

Stephen R. Wassersug, Director  
Hazardous Waste Management Division

Attached for your concurrence is the subject draft permit for a new commercial drum storage and treatment facility. Also provided is a joint EPA-DER Public Notice, announcing preparation of a draft permit.

The Public Notice addresses the issue that the applicant has reported there are no solid waste management units (SWMU's) at the proposed site.

cc: Roland W. Schrecongost  
Deputy Director  
Hazardous Waste Management Division

3HW33:G. Horwitz:E. Elishewitz:7-6797:7/23/85

## CONCURRENCES

SYMBOL	3HW33 E. Elishewitz	3HW33 Anderson					
SURNAME	Horwitz	Anderson					
DATE	7/23/85	7/23/85					

RCRA Draft Permit - East Coast Chemical Disposal, Inc.  
 Marcus Hook, PA - PAD 98 070 6162

Gilbert Horwitz  
 Environmental Scientist (3HW33)

See Addressees

Thru: Patricia M. Corbett, Acting Chief  
 Pennsylvania Section (3HW33)  
 Hazardous Waste Management Branch

The subject draft permit is for a new commercial drum storage facility to be located in Marcus Hook, PA.

This is the second draft to be sent out for review. Since the first draft went out for internal comment last year, the company has decided to double the number of RCRA wastes it wishes to store. This has resulted in extensive modifications to the cell configuration to ensure compatibility.

Please provide comments or concur within one week of receipt of the draft permit.

Addressees:

Patricia M. Corbett (3HW33)  
 Peter Schaul (3HW11)  
 Heather Winett (3RC20)  
 Patrick R. Anderson (3HW30)  
 Robert Allen (3HW00)

3HW33:G. Horwitz:E. Elishewitz:7-6797:7/8/85

CONCURRENCES

SYMBOL	3HW33	3HW33	3HW11	3RC20	3HW30	3HW00	3HW00
SURNAME	Horwitz	Corbett	Schaul	Winett	Parkinson	Allen	Schaefer
DATE	8/8/85	7/8/85	04/7/85	7/17/85	7/25/85	7/24/85	7/24/85